FOR ARGUMENT

Supreme Court, U. S.
FILED
MAR 7 1978
MICHAEL RODAK, JR., CLERK

SUPPLEMENTAL APPENDIX

IN THE

Supreme Court of the United States

October Term, 1977.

No. 77-404.

CITY OF PHILADELPHIA, et al.,
Appellants,

v.

STATE OF NEW JERSEY, et al.,
Appellees.

On Appeal From the Supreme Court of the State of New Jersey.

Jurisdictional Statement Filed September 15, 1977.
Probable Jurisdiction Noted November 28, 1977.

International Printing Co., 711 So. 50th St., Phila., Pa. 19143 — Tel. (215) 727-8711

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AFFIDAVIT OF BERNHARDT V. LIND.

STATE OF NEW JERSEY }
COUNTY OF MERCER } *ss.:*

BERNHARDT V. LIND, of full age, being duly sworn according to law, upon his oath deposes and says:

1. I am the Acting Chief of the Bureau of Technical Services in the Office of Solid Waste Administration within the Department of Environmental Protection (hereinafter "DEP"). I am responsible for analyzing and managing the present and future solid waste disposal problems faced by the State of New Jersey. I have held this or a similar position in the Bureau of Solid Waste Management since March 1973.

2. Prior to the New Jersey statute banning the disposal of out-of-state waste in New Jersey solid waste facilities (January 1974), the records of the DEP indicate that 1.5 million tons per year of out-of-state waste was buried in New Jersey landfills, .85 million tons of which originated in Pennsylvania and .65 tons of which originated in New York. In calendar year 1974 (the first year P. L. 1973, c. 363 was to have been in effect) out-of-state waste dumping increased in volume to 2.4 million tons in New Jersey landfills, an increase of almost one million tons. Of the 2.4 million tons of waste, 1.7 million tons originated in Pennsylvania and .7 million tons originated in New York. In calendar year 1975 (the second year P. L. 1973, c. 363 was to have been in effect), out-of-state waste dumping reached 1.8 million tons in New Jersey landfills, 1.4 million tons originating in Pennsylvania and .4 tons originating in New York. Thus, between January 1974, the effective date of P. L. 1973, c. 363, and January 1976, 5.7 million tons of out-of-state solid waste was dumped in New Jersey. Viewed from the perspective of final disposition, 5.7 mil-

lion tons of solid waste deposited to a depth of 20 feet in a landfill operated in compliance with the regulations of DEP would occupy an area of 530 acres, which represents a depletion of almost one square mile of landfill area.

3. While the records of the Bureau of Solid Waste Administration show a decrease in total tonnage of in-state and out-of-state solid waste dumping in 1975 reflecting the economic recession that was experienced by the Northeast in that year, the out-of-state share of solid waste dumping in New Jersey is 20% of all New Jersey dumping, a figure which shows that the out-of-state share has doubled since 1971. Additionally, Philadelphia's contribution to New Jersey's solid waste load has continued to increase: an analysis of the solid waste dumping by the Philadelphia Department of Streets shows a 50% increase in its dumping from 1974 to 1975, from 33,000 tons/month to 50,000 tons/month. This increase is also reflected by the fact that Philadelphia dumped 12.4% of the total tonnage at the 13 New Jersey landfills it used in 1974 but in 1975 increased its share to 24.7% of the totals at these landfills.

4. Using the tonnage figures given by the landfills in their registration statements certified to DEP in 1975 as well as projections for a 12 month period based on tonnage figures given by the landfills for November and December 1976, it can be seen that the trend showing increased usage of New Jersey landfills by Philadelphia is presently continuing. For instance, Florence Landfill, which certified 46,676 tons (3973 tons/month) of waste deposited in 1975, is projected to have had 124,168 tons (10,347 tons/month) dumped in 1976, an approximately 3-fold increase; Big Hill Landfill (owned by Burlington Environmental Management Services, Inc.) increased from 18,696 tons (1558 tons/month) dumped in 1974 to 99,258 tons (8272 tons/month) in 1976, a 5-fold increase; Warner Company Landfill (now owned by Waste Resources, Inc.) increased from 275,000 tons (22,550 tons/month) in 1975 to 326,695 tons (27,391 tons/month) in 1976, a 16% increase; Mac Landfill and Kinsley Landfill (both owned by Scientific, Inc.) increased from a combined total of 491,118 tons (40,527 tons/month) in 1975 to 536,894 tons (44,741 tons/month) in 1976, a 9% increase; Buzby Brothers Landfill increased from 139,000 tons (11,587 tons/month) in 1975 to 179,000 (14,917 tons/month) a 23% increase; Ward Landfill increased from 131,250 tons (10,938 tons/month) to 290,535 tons (24,211 tons/month) a 2-fold increase; Amadei Landfill (owned by Gloucester Environmental Services, Inc.) increased from 352,700 tons (29,392 tons/month) in 1975 to 500,000 tons (41,741 tons/month) a 30% increase; Hawthorne, Inc. Landfill increased from 28,000 tons (2335 tons/month) in 1975 to 41,111 tons (3426 tons/month) in 1976, an increase of 32%; and Kramer Landfill increased from 129,936 tons (10,753 tons/month) in 1975 and 243,030 tons (20,252 tons/month) in 1976, a 2-fold increase. Only Q. T. Landfill and Development Company have had a decrease in loadings.

5. The figures above can only be viewed with extreme alarm. For as predicted in previous affidavits in this matter, expansions of old landfills (both legal and allegedly illegal) have occurred at the expense of scarce rural New Jersey acreage and at the expense of an increasingly precious rural environment, because the New Jersey landfills simply cannot keep pace with the increasing disposal volume burdening New Jersey while also conforming to public health and safety regulations. For instance, during 1976, plaintiff Fazzio Landfill was closed and during 1977, plaintiff Mac Sanitary Landfill was closed because of environmental (including odor problems) and aesthetic considerations; on the other hand, the loss of volume from these closures was picked up by other landfills like Kinsley

Landfill and Florence Landfill. Furthermore, applications have been received for new landfills in most of the New Jersey counties close to Philadelphia and will need to be approved because of the staggering increase in loadings at existing sites. For example, Interstate Waste Removal Co., Inc. plans a sanitary landfill in Bordentown, Burlington County, with a capacity of 2,150,000 tons of solid waste (there is citizen opposition to any approval because of the close proximity of this property to Bordentown High School); Waste Resources, Inc. has an application pending for a sanitary landfill in Voorhees Township, Camden County, with a capacity for 1,400,000 tons of solid waste and site size of 89 acres; John P. Fazzio Landfill, Inc. has applied for a sanitary landfill on a site adjacent to its now closed facility in Bellmawr Borough, Gloucester County: Florence Landfill has indicated a desire to expand an additional 60 acres; Q. T. Landfill in Salem County plans to expand to 998,000 ton capacity on 109 acres. Additionally, DEP investigators allege that the Florence Landfill is both dug deeper and stacked higher than its approved design elevations; that Fazzio Landfill is alleged to have been packed over its capacities and beyond its designated borders; that Buzby Brothers is operating beyond its approved capacity; that Amadei Landfill will close above the level earlier approved by DEP. Such illegal conditions are suspected at other landfills also and indicate that New Jersey landfills are growing out of control.

In summary, the additional pressures being put on New Jersey landfills is causing and will continue to cause expansion of and applications and approvals of new sanitary landfills unless Pennsylvania's dumping is controlled. And while it was once believed that solid waste could be used for land reclamation, examination of closed landfills reveal that their use for building purposes is not desirable due to the high cost of required piling and the high cost of

gas accumulation prevention measures. Thus, all lands used for landfills are a loss for future use—a fact of great alarm in a small state like New Jersey.

6. Further problems exist as a result of the need to open up and expand existing facilities beyond their design capacity. For example, due to the closing of Mac Landfill and Fazzio Landfill, a significantly increased volume of waste is being dumped at Big Hill Landfill. The subsurface geology of this landfill consists primarily of highly permeable sands which could allow dripping and dangerous leachate (a noxious and high polluted liquid often caused by landfills) as well as methane gases to percolate and flow through the earth's strata and into the important groundwater of the State. Furthermore, expanding existing landfills could lead to increased health hazards caused by rodents, fires and scavenger birds; landfills also, needless to say, do not help New Jersey's aesthetic appearance nor New Jersey's noise or water or air pollution problems. In fact, citizen complaints regarding noise and odors have been received by DEP regarding Big Hill Landfill and there are also indications that said landfill may be causing water pollution problems in the underlying Cohansey and Kirkwood aquifers. Thus, it can be concluded that the above potential environmental insults demand that New Jersey not perpetuate "bad" landfills and that the number of landfills be held to a minimum.

7. Based on the review of information available from the Pennsylvania Department of Environmental Resources (hereinafter "DER") and my conversations with Pennsylvania landfill operators, it is my opinion that there continues to be sufficient landfill capacity in Pennsylvania within a 50 mile radius of Center City Philadelphia to accommodate the amount of Pennsylvania solid waste currently being disposed of in New Jersey landfills. For

instance, five new additional landfills have received permits in 1976 (Coaldale Landfill, Boyertown Landfill, Higgins Township Landfill, South Coatesville Landfill and West Schukyll Council for Good Government Landfill) and Strasburg Landfill has begun site preparation. Accordingly, if out-of-state solid waste can no longer be disposed of in New Jersey, it would not be necessary for Philadelphia to allow its solid waste to pile up on its streets. In addition, at the time P. L. 1973, c. 393 was to have gone into effect the DER developed an emergency plan to handle Pennsylvania solid waste being disposed of in New Jersey. On information and belief that emergency plan included a "gentleman's agreement" with the landfills in the surrounding Pennsylvania counties to accommodate Philadelphia's solid waste. Furthermore, in an emergency situation, a sanitary landfill can be operational within 4 to 6 weeks from approval, depending upon the number and type of improvements which have to be made prior to commencing dumping operations. There is sufficient suitable land for sanitary landfill purposes in Pennsylvania within 50 miles of Center City Philadelphia on which sanitary landfills could be operated. See "A Plan for Solid Waste Management in Pennsylvania", Commonwealth of Pennsylvania, Department of Health (June 1970), a portion of which is attached to my affidavit of December 8, 1975 as Exhibit C submitted to the Court in Brief, Affidavit and Appendix in Opposition to Motion for Remand and Stay. I know of no reason why the environmental and engineering problems associated with the commencement and operation of the sanitary landfills would be any more difficult in Pennsylvania within a 50 mile radius of Philadelphia than they would be in New Jersey. Thus, any difficulties which may be encountered in accommodating Philadelphia's waste in these landfills would not be due to lack of physical capacity.

8. Furthermore, a transportation system is available to get the City of Philadelphia's waste to the Pennsylvania landfills. The City of Philadelphia has the vehicular capacity to dump the waste destined to New Jersey in Pennsylvania. Moreover, as I lived in Philadelphia for 25 years and am familiar with the road systems in Philadelphia and the surrounding counties of Philadelphia, it is my opinion that the existing highway system is adequate to enable Philadelphia to establish a regular and dependable collection system for disposal in existing Pennsylvania landfills within a 50 mile radius of Center City Philadelphia. Finally, Philadelphia's rail haul project seems to be getting underway after long delays; on information and belief, Philadelphia has recently hauled solid waste to a site in Lancaster, Pennsylvania.

9. While no areas are perfect for landfill operations, some are more suitable than others. One factor in making such a judgment would be subsurface soil composition. It should be noted that southern New Jersey is not a very suitable area for landfilling because the subsurface soil, with very few exceptions, consists of highly permeable sands which allow dangerous leachate to pour into the groundwaters of the area. The soils in the Philadelphia Metropolitan Region, on the other hand, are better suited for landfill purposes. See Exhibit C which is attached to my affidavit of December 8, 1975 submitted to the Court in Brief, Affidavit and Appendix in Opposition to Motion for Remand and Stay.

10. Pennsylvania has alternative means to dispose of its solid waste. For instance, incinerators can cut the solid waste load. However, Philadelphia has done nothing to upgrade additional incinerators so that disposal could be accomplished while meeting air pollution control standards.

11. At the present time, the only viable method of solid waste disposal that exists in New Jersey is through sanitary landfills. However, even though landfills are necessary, they are, at best, a necessary evil. It is only good sense and good government, then, to support the proposition that landfills should not be expanded nor new operations started. Thus, the forces causing expansions and new starts must be controlled; it is for this reason that P. L. 1973, c. 363 was passed by the Legislature of New Jersey. The subsequent history of alarming increases in additional landfill capacity only supports the wisdom of that piece of legislation.

/s/ BERNHARDT V. LIND
Bernhardt V. Lind

Sworn to before me this 15th day of March, 1977.

/s/ PETER J. HERZBERG
Peter J. Herzberg
Attorney at Law of the State
of New Jersey

AFFIDAVIT OF LINO F. PEREIRA.

STATE OF NEW JERSEY
COUNTY OF MERCER } *ss.:*

LINO F. PEREIRA, of full age, being duly sworn according to law, upon his oath deposes and says:

1. I am Chief, Bureau of Planning, Design and Resource Recovery in the Solid Waste Administration of the Department of Environmental Protection of the State of New Jersey. I am presently responsible for evaluating the existing capacity and environmental impacts of New Jersey landfills, planning for future disposal facilities so as to insure that such landfills are compatible with New Jersey's environment and developing a State-wide plan for solid waste management. In the course of these duties, I review major new disposal sites and am conversant with the state of the art of technology in solid waste disposal. I hold a license as a Professional Engineer in the State of New Jersey and have been employed by the Solid Waste Administration or its predecessors for the past seven years.

2. On January 30, 1974, December 8, 1975, December 29, 1975 and March 15, 1977, Bernhardt V. Lind executed affidavits that were filed in this matter. The facts therein remain unchanged except to the extent that they are supplemented by this affidavit.

3. The increase in out-of-state dumping reflected in Lind's affidavit of March 15, 1977 continues to have a serious impact on New Jersey. The reason for this is straightforward: most pollution problems are directly related to the amount of solid waste deposited in a particular landfill. It is common practice for researchers to express the results of their leaching tests in terms of pounds leached per ton of solid waste. Therefore, each additional

ton of solid waste that New Jersey must suffer in its landfills will produce a corresponding increase in pollution.

4. With respect to the four sites listed as depositories of Philadelphia waste in David J. Damiano's affidavit of June 30, 1977, serious pollution problems exist which are exacerbated by the large amount of out-of-state waste dumped.

a. Big Hill Landfill—Southampton Township, New Jersey—55 acres. Big Hill Landfill, which was once a minor landfill operation situated in a former sand pit, has been transformed into a major disposal site for Philadelphia's waste at the cost of air and noise pollution, traffic congestion, unsightliness and various other disturbances to the residents of a nearby retirement community that was built when the landfill was a minor operation. Approximately 100 citizen letters and a petition bearing the signatures of approximately 1500 persons complaining of the above problems have been received by the Solid Waste Administration. These complaints were received subsequent to Big Hill's acceptance of Philadelphia solid waste. Furthermore, this landfill, which is in the environmentally-sensitive Pine Barrens, has been causing water pollution problems (high level of phenols and high level of chemical oxygen demand) in the Cohansey and Kirkwood aquifers which together constitute a prime potable water source in the area.

b. L & D Landfill—Mount Holly, New Jersey—190 acres. State laboratory analyses show that this landfill has contaminated the Mount Laurel-Wenonah aquifer, which is a major source of domestic supply for the surrounding community. These analyses show groundwater contamination reflecting levels of oxygen demand in the groundwater itself six to eight times that found in raw domestic sewage and fecal coliform levels too great to determine.

Because of this water pollution problem, the Solid Waste Administration has entered into a stipulation requiring the operator to cover the landfill with an impermeable plastic membrane so as to limit rainwater infiltration, and to take other pollution measures, such as operating atop a plastic barrier in order to collect leachate, pumping contaminated groundwater from the site and installing additional monitoring wells. The above methods are experimental and will not necessarily be corrective of the groundwater pollution problem. L & D has also had to provide water supply to nearby residential units because of the groundwater problem. Finally, this landfill was sued by Easthampton Township which sought closure of the facility because of alleged pollution.

c. Kramer Landfill—Mantua Township, New Jersey—88.5 acres. This landfill is located on sandy soil of the Mount Laurel-Wenonah aquifer and has had a leachate problem which State laboratory analysis has shown to have resulted in degradation of the ground and surface waters in the area. This problem threatens public water supply wells within a half mile of the site, and accordingly the landfill was ordered to close in April 1977 by the Solid Waste Administration. Prior to this, the Solid Waste Administration has taken against this landfill every type of administrative enforcement action within its power.

d. Kinsley Landfill—Deptford Township, New Jersey—67.3 acres. During 1973 this landfill was polluting streams near the site, and therefore the pollution problem was ordered corrected. Recently shallow, medium and deep wells within the Wenonah-Mount Laurel aquifer, a major potable water source, have shown contamination, and it appears probable that the Kinsley Landfill is responsible for such contamination. Furthermore, under its present permits, this landfill has less than two years of life

remaining, although it has a long-term contract with the City of Philadelphia.

5. In his affidavit of December 19, 1975, David J. Damiano maintains that existing landfill capacities in Pennsylvania have been fully committed. Subsequent to the filing of that affidavit, however, there were permits granted for a number of new landfill sites near the City of Philadelphia. (Letter dated November 8, 1976 of William C. Bucciarelli, Chief, Division of Solid Waste Management, Department of Environmental Protection, Commonwealth of Pennsylvania, a copy of which is attached hereto as "Exhibit A"). Furthermore, statements regarding commitment of landfill space mean nothing because any system which may exist in Pennsylvania for committing landfill space can be revised to accommodate Philadelphia waste. Additionally, existing facilities can be expanded and new facilities constructed.

6. In his affidavit of July 5, 1977, Bernard J. McHugh states that using available Pennsylvania landfill sites within 50 miles of Philadelphia is impractical due to hauling distances, traffic congestion and road configurations. A 1972 study by the Delaware Valley Regional Planning Commission analyzing direct and alternate routes to and from Philadelphia indicates that transportation to Pennsylvania sites is comparable to transportation to New Jersey sites. Additionally, the existing Pennsylvania landfills are not appreciably more distant from Philadelphia than the New Jersey landfills at which Philadelphia dumps its wastes. Consequently, Philadelphia should be able to continue its collection service without need for additional manpower or equipment.

7. An analysis of the truck size entering New Jersey landfills indicates that unlike most of the waste collected in

New Jersey, the waste collected in Philadelphia is hauled in large economical transfer vehicles. If Philadelphia were to utilize Pennsylvania sites rather than New Jersey sanitary landfills for the disposal of its solid waste, it is my opinion that the average cost of collection and disposal would not increase by more than 10 per cent.

8. In his affidavits of March 30, 1977 and June 29, 1977, Richard Peluso maintains that sanitary landfills may be used for land reclamation and that completed landfills have been utilized for post offices, shopping centers and airports. Such notions are archaic. Most lands with the potential for reclamation are either in swamp or sand and gravel pits, both of which are environmentally unsuitable areas for the placement of landfill materials. In fact, it is common engineering practice to remove all solid waste materials from a discontinued landfill prior to construction thereon. Landfills are a structurally unstable fill subject to differential settlement that may be hazardous. Additionally, landfills produce methane gas which can accumulate in explosive concentrations, either within or beneath any structure built on a landfill. Instances of destruction of property and loss of life have been recorded as a result of explosions related to landfill gases. Because of this, the Solid Waste Administration has allowed millions of cubic yards of solid waste to be excavated prior to construction at completed landfills and these transferred materials have further contributed to exhausting space in New Jersey landfills. For example, the only shopping center in New Jersey known to me to have been constructed on a former landfill initially required excavation of the solid waste. Furthermore, the only post office that I am aware of that was built in New Jersey on a completed landfill was beset by numerous problems by reason of its location. The landfill settled beneath the foundation, which was supported by

piles, creating a gaping pocket between the foundation and the solid waste. Hazardous methane gas collected in an explosive concentration within the pocket. The immediate problem was resolved through installation of a mechanical venting system which contributed to a construction cost overrun of over 100%.

9. Mr. Peluso's affidavit also implies that the Parklands Reclamation Project located in Bordentown Township, New Jersey will be open for Philadelphia waste disposal. However, this landfill located near Trenton, New Jersey is not to be a source for Philadelphia waste but is to replace two landfills in the Trenton area. This is substantiated in the design documents prepared by Wehren Engineering Corporation (a concern with which Mr. Peluso is associated) which state:

> "Solid waste management plans for the adjacent Philadelphia area are not applicable to this project since it is not the intention of Interstate (the owners of Parklands landfill) to accept wastes from out-of-state" (p. 27).

10. In his affidavit of July 6, 1977, Leo F. Hughes states that his landfill, Landfill Development Company, would have to close if P. L. 1973, c. 363 went into effect. It should be noted that Landfill Development Company has caused extreme pollution problems because of poor operational policies that have resulted in an alleged expenditure of $1 million in an effort to minimize these problems. Regardless, this facility still accepts great amounts of Philadelphia waste. Such waste and its manner of disposal have contributed to the pollution problems of the landfill. Mr. Hughes states that over 80% of the volume of waste disposed at his landfill comes from the Philadelphia area. If this landfill had been limited to the 20% of its waste originating in New Jersey, the pollution problem would be correspondingly less severe and its abatement would be greatly simplified.

11. In his affidavit of July 6, 1977, Vincent A. Suozzi states that Glen Cove, Long Island, New York must use New Jersey facilities to dispose of Glen Cove's solid wastes which must come all the way down to Middlesex County, New Jersey—a distance of approximately 75 miles. Surely, a landfill could have been found in New York State closer to Glen Cove. Furthermore, an interim landfill could have been established for use during the five-year period that Mayor Suozzi refers to in terms of developing a long-term solution for the City's disposal of solid wastes. Indeed, that option is still open to the City.

12. In his affidavit of July 6, 1977, Marvin Mahan states that more than 80% of the volume of refuse disposed of at his facility comes from the Philadelphia area. The operation of the landfill has produced many environmental problems. If the landfill had been limited to that 20% of waste originating in New Jersey, the pollution problems would have been correspondingly less severe and the abatement would have been greatly simplified. Mr. Mahan also refers to an application for expansion of the Kinsley Landfill which is before the Solid Waste Administration in conceptual form. The proposed expansion envisions a landfill 200 feet above surrounding elevation—a height which is equivalent to a 15 to 20-story building.

13. Sanitary landfills are a necessary evil but they produce substantial pollution levels. Leachate from presently existing landfills is typically 20-50 times as concentrated in pollutants as raw sewage. In fact, the total water pollution loadings from landfills in New Jersey are comparable to all of the pollution contained in New Jersey's sewage prior to treatment. Sanitary landfills have tra-

ditionally been the primary method of disposing of solid waste in New Jersey. Because of the environmental problems associated with landfills, I am convinced that better means of disposal exist. It is a responsibility of my office to promote the maximum development of resource recovery operations within the State.

14. Even a landfill designed to meet the most advanced state of the art is likely to encounter environmental problems. Thus, improvements at landfills do not seem to eliminate pollution but only to minimize and assist in healing. Even in this regard the efficacy of such measures remains to be established. For the most part, pollution is generally irreversible in the hands of man, but can only be undone by time and Nature's slow processes.

/s/ LINO F. PEREIRA
Lino F. Pereira

Sworn to and Subscribed before me this 14th day of July, 1977.

/s/ PETER J. HERZBERG
Peter J. Herzberg
An Attorney-at-Law of
the State of
New Jersey

Exhibit "A".

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
Post Office Box 2063
Harrisburg, Pennsylvania 17120

November 8, 1976

Mr. Lee Pereira
Bureau of Solid Waste Management
Division of Water Resources
Department of Environmental Protection
Trenton, New Jersey 08625

Dear Mr. Pereira:

This is to confirm your telephone request of November 1, 1976, regarding update information on solid waste facilities in Pennsylvania within certain distances of Philadelphia.

The Strasburg Corporation Landfill is not operational but is doing some site preparation. There was no substantial change except reduction in remaining capacities regarding the following facilities from the information supplied previously to Mr. Bernhardt Lind: (a) Warner Landfill, (b) Francis Cloud Landfill, (c) Novak Landfill, (d) Western Berks Authority Landfill, (e) Pottstown Disposal Landfill, (f) Chrin's Landfill, (g) Berks Corporation Landfill, and (h) Lanchester Landfill.

We issued permits to the following new landfill sites in approximately the same area: (a) Coaldale Landfill, Rahn Township, Schuylkill County, permit issued 7/15/76, (b) Boyertown Landfill, Douglas Township, Montgomery County, permit issued 8/5/76, (c) Higgins Township Landfill, Higgins Township, Schuylkill County, permit issued

3/13/76, (d) South Coatesville Landfill, Chester County, permit issued 10/21/75, and (e) West Schuylkill Council for Good Government Landfill, Reilly Township, Schuylkill County, permit issued 5/25/76.

I would appreciate, if possible, additional information on the assessment rates per cubic yard and gallon of wastes New Jersey is contemplating or has in effect which you described to me very briefly. It sounds real good and perhaps is something Pennsylvania and other states should look into. It would be helpful if you have copies of acts, bills, rules and regulations, or any literature you could send me.

Thanks.

Sincerely,

BILL
William C. Bucciarelli, Chief
Division of Solid Waste Management